

*Debra Schmidt*  
DIRECTOR OF TELEPHONE SERVICES

# WORLDNET LLC®

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FILED UNDER SEAL**

February 26, 2009

Marlene H. Dortch  
Office of the Secretary  
ATTN: CPNI Compliance Report  
Federal Communications Commission  
445 12<sup>th</sup> Street, Suite TW0A325  
Washington D.C. 20554

**Re: EB Docket No. 06-36  
CPNI Compliance Certificate  
WorldNet, L.L.C.**

Dear Ms. Dortch:

Enclosed is the CPNI Compliance Certificate for WorldNet, L.L.C. Please note that this report is confidential and is filed under seal. A copy will be provided to Best Copy and Printing, Inc., 445 12<sup>th</sup> Street, Suite CY-B402, Washington D.C. 20554 via email.

Sincerely,



Debra Schmidt  
Director of Telephone Services  
WorldNet, L.L.C.

Enclosures:

Officer's CPNI Compliance Certificate  
Attachment to Statement Regarding CPNI Operating Procedures

cc: Best Copy and Printing, Inc.  
445 12<sup>th</sup> Street, Suite CY-B402  
Washington D.C. 20554  
Email: FCC@BCPIWEB.COM

**OFFICER'S CPNI COMPLIANCE CERTIFICATE**

**Annual 47 C.F.R. Section 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 26, 2009

Name of company covered by this certification: WorldNet, L.L.C.

Form 499 Filer ID: 0004937116

Name of signatory: Dan Simons

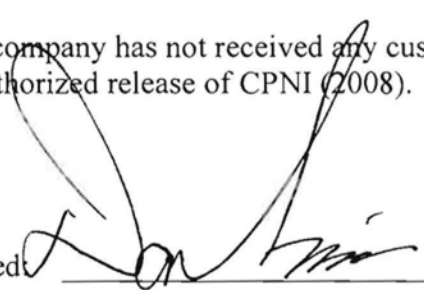
Title of Signatory: Manager

I, Dan Simons, certify that I am Manager of WorldNet, L.L.C. ("WorldNet"), and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to insure compliance with the Commission's CPNI rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations ("Customer Proprietary Network Information").

Attached to this certification is an accompanying statement explaining how the CPNI operating procedures of WorldNet, L.L.C. ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et. seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system or at the Commission against data brokers) against data brokers in the past year (2008).

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (2008).

Signed  \_\_\_\_\_

Date: 2-25-09 \_\_\_\_\_

## **ATTACHMENT TO OFFICER'S CPNI COMPLIANCE CERTIFICATE**

### **Statement Regarding CPNI Operating Procedures**

WorldNet's written CPNI Operating Procedures ensure that WorldNet will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of WorldNet's CPNI Operating Procedures are:

- A requirement that WorldNet have at all times a CPNI Compliance Officer to supervise the implementation of WorldNet's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- Detailed procedures for obtaining opt-out and opt-in approval from customers.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement for supervisory approval of all outbound marketing campaigns, including determination of any customer approval requirements for the campaigns.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

### **Actions Taken Against Data Brokers**

WorldNet was not required to take action against any data brokers in 2008.

### **Summary of Customer Complaints Based on Unauthorized Release of CPNI**

WorldNet received no customer complaints based on unauthorized release of CPNI in 2008.